

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LAWRENCE GERARD NASSAR,

Defendant.

INDICTMENT

The Grand Jury charges:

COUNT 1

(Receipt and Attempted Receipt of Child Pornography)

Between on or about September 18, 2004 and December 1, 2004, in Ingham County, in the Southern Division of the Western District of Michigan, the defendant,

LAWRENCE GERARD NASSAR,

did knowingly receive and attempt to receive child pornography that had been shipped and transported in interstate and foreign commerce by any means, including by computer; that is, the defendant received and attempted to receive, via the Internet, images of child pornography, including, but not limited to, one or more of the following:

1. Nelya095.jpg;
2. 060.jpg;
3. 05.jpg;
4. 30.jpg;
5. 44.jpg;
6. isa-029-069.jpg.

18 U.S.C. § 2252A(a)(2)(A) and (b)(1)
18 U.S.C. § 2256(8)(A)

COUNT 2
(Possession of Child Pornography)

Between on or about February 6, 2003 and September 20, 2016, in Ingham County, in the Southern Division of the Western District of Michigan, the defendant,

LAWRENCE GERARD NASSAR,

did knowingly possess one or more computer disks, electronic files, and other materials that contained thousands of images of child pornography, including, but not limited to, one or more of the following:

- | | |
|---------------------------------------|--------------------|
| 1. pedo - vicky_10_yr_old_orgasm.mpeg | 6. pthc - Sara.jpg |
| 2. lsm04-03-082.jpg | 7. ?37.jpg |
| 3. St_0709.jpg | 8. ?41.jpg |
| 4. S_funny0019.jpg | 9. ?45.jpg |
| 5. pthc - kelly13 young girl.jpg | 10. ?06.jpg |

Such images had been shipped and transported using any means and facility of interstate commerce by any means, including by computer, and were produced using materials that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, including, but not limited to, an AcomData hard drive, which was constructed with components manufactured outside the State of Michigan. The images of child pornography possessed included images that involved a minor who had not attained 12 years of age.

18 U.S.C. § 2252A(a)(5)(B) and (b)(2)
18 U.S.C. § 2256(8)(A)

FORFEITURE ALLEGATION

(Receipt, Attempted Receipt, and Possession of Child Pornography)

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 2253.

Pursuant to 18 U.S.C. § 2253, upon conviction of one or more offenses in violation of 18 U.S.C. § 2252A, the defendant,

LAWRENCE GERARD NASSAR,

shall forfeit to the United States of America, any visual depiction described in 18 U.S.C. § 2252A; any matter which contains any such visual depiction that was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Chapter 110; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense; and any property, real or personal, used or intended to be used to commit or to promote the commission of the offense or any property traceable to such property. The property to be forfeited includes, but is not limited to, the following: AcomData hard drive bearing serial number A0184941.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 2253(b).

18 U.S.C. § 2253(a), (b)

21 U.S.C. § 853(p)

18 U.S.C. § 2252A

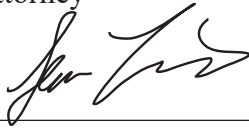
A TRUE BILL



GRAND JURY FOREPERSON

PATRICK A. MILES, JR.

United States Attorney



SEAN M. LEWIS

Assistant United States Attorney